

Exhibit B

From: [Geoppinger, Jeff](#)
To: [David J. Stanoch](#)
Cc: [D'Lesli M. Davis](#); [Ellie Norris](#); [Dennis, Mimi](#); [Campbell, Daniel](#)
Subject: Valsartan - Discovery to Plaintiffs
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Attachments: [2023.04.25 RFP to TPPs FINAL.docx](#)
 [2023.04.25 30\(b\)\(6\) to TPPs FINAL.docx](#)

Dave – As previously discussed and noted in the agenda letter yesterday, Wholesaler Defendants are seeking discovery from Plaintiffs on their unjust enrichment claim. In that regard, attached are Wholesaler Defendants' draft Requests for Production and draft Rule 30(b)(6) deposition topics for discussion and negotiation. I anticipate the first issue for our call today will be plaintiffs' position regarding participation in such discovery. Talk to you at 3.

Jeff

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